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February 11, 2024

**MEMORANDUM ENDORSED**

**VIA ECF AND EMAIL**

The Honorable Gregory H. Woods  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007  
[WoodsNYSDChambers@nysd.uscourts.gov](mailto:WoodsNYSDChambers@nysd.uscourts.gov)

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: <u>2/12/2024</u>
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**RE: *United States v. Joan Mercedes, 22-cr-522 (GHW)***

Dear Judge Woods:

I represent Joan Mercedes who is currently on home detention, and according to Pretrial Services (PTS) has been compliant with his obligations.

On February 15, 2024, Mr. Mercedes' daughter turns 9 years old. Her mother is bringing her to New York to celebrate with Mr. Mercedes. Mr. Mercedes would like to take his daughter and her mother to Sky Zone (a children's play space at the Ridge Hill mall in Yonkers) followed by dinner at Dave and Busters in the Cross County Mall also in Yonkers. We respectfully request a temporary modification of Mr. Mercedes' bail so that he is permitted to leave his home on Thursday, February 15, 2024 from 2PM to 9PM for this purpose. I have consulted with AUSA Ashley Nicolas and the Government takes no position on this request. PTS' position, as a matter of policy, is to oppose temporary modifications for social reasons.

Thank you for your consideration.

Respectfully submitted,




Jill R. Shellow

cc: AUSA Ashley Nicolas (by ECF and email)

Application denied. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 299.

SO ORDERED.

Dated: February 12, 2024  
New York, New York

  
GREGORY H. WOODS  
United States District Judge